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19 ALL NIPPON AIRWAYS COMPANY, LTD.

20 - and -

21 Other counsel as listed on the signature page

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA

24 ALL NIPPON AIRWAYS COMPANY,)	Case No. C07-03422 EDL
25 LTD.,)	
26 Plaintiff,)	JOINT RULE 26(f) REPORT
27 vs.)	
28 UNITED AIR LINES, INC.,)	
29 Defendants.)	

30 AND RELATED COUNTER-CLAIM

31 Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure the parties
32 herein file the following Joint Report.

33 In accordance with Rule 26(f), a conference of counsel was conducted in this
34 case on September 10, 2007. Plaintiff All Nippon Airways Co., Ltd. (hereinafter
35 "ANA") appeared by its attorneys Condon & Forsyth LLP. Defendant United Air

1 Lines, Inc. (hereinafter "UAL") appeared by its attorneys, Worthe, Hanson &
2 Worthe and Jaffe Raitt Heuer & Weiss, P.C.

3 The following are the parties' views and proposals concerning discovery:

4 (1). The parties agree that no changes should be made to the timing, form,
5 or requirement for disclosures under Rule 26(a). The parties agree that they will
6 make their respective Rule 26(a)(1) disclosures pursuant to and in the manner
7 required by the Court's Order no later than September 25, 2007.

8 (2). Both parties anticipate that discovery will be necessary regarding the
9 incident alleged in the complaint and damages to the respective aircraft. The
10 parties agree that it is not necessary to conduct discovery in phases or that
11 discovery should be limited to or focused upon particular issues at this time.

12 (3). The parties agree that no changes should be made limiting discovery
13 imposed under these rules or by local rule, or that any other limitations should be
14 imposed at this time.

15 (4). The parties agree that no claims of privilege need be agreed to or
16 ordered at this time. ANA claims a protective order will be needed with respect to
17 UAL's requests for discovery concerning the Standard Ground Handling
18 Agreement. UAL claims a protective order will be needed with regard to certain
19 documents (including documents relating to calculation of lost use damages
20 relative to the United aircraft being out of service and to overhead).

21 (5). The parties agree that no changes on the limitations on discovery
22 should be imposed at this time.

23 (6). The parties agree that there are no orders that should be entered by the
24 Court under Rule 26(c) at this time. ANA anticipates filing a motion for a
25 protective order concerning UAL's deposition notice and document requests with
26 respect to the Standard Ground Handling Agreement. UAL anticipates requesting
27 a protective order relative to certain documents. Additionally, UAL anticipates
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1 filing a motion to compel relative to its pending deposition notice and document
2 requests pertaining to the Standard Ground Handling Agreement.

3 The parties agree that there are no orders that should be entered by the Court
4 under Rule 16(c) at this time. However, the parties agree that a Rule 16(b)
5 Scheduling Order should be entered by the Court at this time.

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9 Dated: September 25, 2007

CONDON & FORSYTH LLP

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11 By: 

12 FRANK A. SILANE
13 SCOTT D. CUNNINGHAM
14 MARSHALL S. TURNER (*pro hac vice*)
15 Attorneys for Plaintiff and Counter-
16 Defendant
17 ALL NIPPON AIRWAYS COMPANY,
18 LTD.

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28 Dated: September 25, 2007

JAFFE RAITT HEUER & WEISS, P.C.

By: _____

SCOTT R. TORPEY
Attorney for Defendant
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11 By: 

12 FRANK A. SILANE
13 SCOTT D. CUNNINGHAM
14 MARSHALL S. TURNER (*pro hac vice*)
15 Attorneys for Plaintiff and Counter-
16 Defendant
17 ALL NIPPON AIRWAYS COMPANY,
18 LTD.

19 Dated: September 25, 2007

20 JAFFE RAITT HEUER & WEISS, P.C.

21
22 By: 

23 SCOTT R. TORPEY
24 Attorney for Defendant
25 UNITED AIR LINES, INC.
26
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